

I have read the new interim regulations for the Maritime Transportation Security Act of 2002 and I have a comment. Merchant Marine Officers have to take too many courses! I am currently trying to get my chief mate license and here is a list of courses I need for it:

Advanced Navigation
Advanced Colregs
ARPA
Advanced Meteorology
Advanced Stability
Cargo Handling
Voyage Planning
ECDIS
Marine Propulsion Plants
Advanced Shiphandling
Radar
Ship management including Emergency Response
CPR and First Aid
Medical care provider
Medical PIC
Bridge resource management
Personal responsibility
Basic Safety
Basic Firefighting
Advanced Firefighting
Communications (Flashing Light)
GMDSS
GMDSS maintainer (as per new USGC policy# [06-03])
Tankerman PIC
Plus all the additional courses my company requires.

Most of these courses are 1 week long and many are 2 weeks. The majority of Merchant Mariners are away from home for half of the year, and after taking all of these courses are not home at all. This is making it impossible for anyone who wants to have a family to sail.

There is also the problem of an overload of paperwork and responsibilities on the ships crew that can take your attention away from important duties like navigation and safety inspections.

The addition of a Vessel Security Officer course is just the latest of a long line of new requirements that are becoming an unreasonable burden on Merchant Marine Officers. I believe that these additional courses will continue to erode the number of qualified US mariners and increase the incentives for companies to re-flag and hire foreign crews.

Sincerely,
John Konrad